

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3:15CR358
)	
Plaintiff,)	
)	JUDGE JEFFREY J. HELMICK
v.)	
)	
IBRAHIM ZUBAIR MOHAMMAD,)	
)	
Defendant.)	
)	

GOVERNMENT’S RESPONSE IN OPPOSITION TO DEFENDANT
IBRAHIM ZUBAIR MOHAMMAD’S MOTION *IN LIMINE* TO EXCLUDE TESTIMONY OF
DR. ALEXANDER MELEAGROU-HITCHENS

Now comes the United States of America, by and through its counsel, Justin E. Herdman, United States Attorney, and Matthew W. Shepherd and Michael J. Freeman, Assistant United States Attorneys, and Gregory R. Gonzalez and David C. Smith, Trial Attorneys, U.S. Department of Justice, Washington, D.C., and hereby responds in opposition to Defendant Ibrahim Zubair Mohammad’s Motion to Join Co-Defendant Motion *In Limine* (Doc. 294), in which Mohammad argues that the testimony of government expert witness Dr. Alexander Meleagrou-Hitchens should be excluded. He raises substantially the same arguments raised in co-defendant Sultane Salim’s previously filed Motion *in Limine* to Exclude Expert Dr. Alexander Meleagrou-Hitchens’ Testimony. (Doc. 271). The government filed a response opposing Sultane Salim’s motion. (Doc. 287). The government opposes Defendant Ibrahim Mohammad’s motion for the same reasons and adopts and incorporates herein its previously filed response. (Doc. 287). If the Court requires a further response addressing Defendant

Ibrahim Mohammad's motion, the government requests an additional two weeks to file its response.

For the reasons stated in its previously filed response, the government respectfully requests that this Court deny the Defendant's motion without a hearing. The expected testimony of Dr. Meleagrou-Hitchens is relevant and based on a reliable methodology as required under Rule 702 of the Federal Rules of Evidence. Furthermore, the expected testimony is not unduly prejudicial and, therefore, it is admissible under Rule 403 of the Federal Rules of Evidence.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: /s/ Matthew W. Shepherd
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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2018, a copy of the foregoing Government's Response in Opposition to Defendant Ibrahim Zubair Mohammad's Motion in Limine to Exclude Testimony of Dr. Alexander Meleagrou-Hitchens was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Matthew W. Shepherd

Matthew W. Shepherd
Assistant U.S. Attorney